

to 2255
MOTION
GX801A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v.- :

STIPULATION

ROSS ULBRICHT, :

S1 14 Cr. 68 (KBF)

a/k/a "Dread Pirate Roberts," :

a/k/a "DPR," :

a/k/a "Silk Road," :

Defendant. :

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IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by Preet Bharara, United States Attorney for the Southern District of New York, Serrin Turner and Timothy Howard, Assistant United States Attorneys, of counsel, and Ross Ulbricht, by and through his counsel, Joshua Dratel, Esq., as follows:

If called to testify, Heather M. Miller, a Senior Forensic Chemist with the Drug Enforcement Administration ("DEA"), would testify that:

1. Government Exhibit 801 is a summary chart reflecting 52 substances that were submitted for laboratory testing to the DEA North Central Laboratory in Chicago, Illinois by Homeland Security Investigations Special Agent Jared DerYeghiayan.

a. The column labeled "Seizure Number" indicates the seizure number associated with the substance.

b. The column labeled "Date Analyzed" indicates the date the substance was laboratory tested.

c. The column labeled "Net Weight" indicates the weight of the substance submitted for testing, after removal of any packaging.

d. The column labeled "Drug Detected" indicates any illegal drugs the substance was found to contain through testing a sample of the substance, using reliable laboratory procedures.

e. The columns labeled "Purchase Date" and "Vendor" reflect information provided by Special Agent DerYeghiayan concerning the date when each substance was purchased from the Silk Road website and the vendor from whom the purchase was made.

2. As reflected in Government Exhibit 801, all but one of the 52 substances tested positive for illegal drugs.

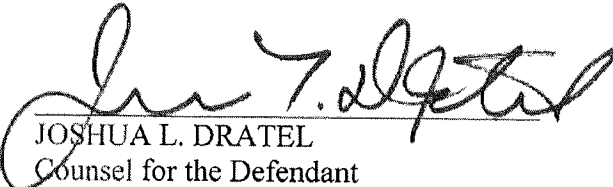
IT IS FURTHER STIPULATED AND AGREED that Government Exhibit 801 and this Stipulation (Government Exhibit 801A) are admissible as Government exhibits at trial, except that the defendant reserves the right to object to these exhibits under Federal Rule of Evidence 403 or 404(b).

Dated: New York, New York
December 8, 2014

PREET BHARARA
United States Attorney
Southern District of New York

By: 

SERRIN TURNER
TIMOTHY T. HOWARD
Assistant United States Attorneys


JOSHUA L. DRATEL
Counsel for the Defendant